EXHIBIT E

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1
     UNITED STATES DISTRICT COURT
     FOR THE SOUTHERN DISTRICT OF NEW YORK
     Case No: 1:19-cv-03825(JMF)
2
     ______
3
     JASON BOYCE,
4
                           Plaintiff,
5
                   -against-
     BRUCE WEBER and LITTLE BEAR INC.,
6
7
                          Defendants.
     ----x
     Case No. 1:18-cv-12112
8
     ----x
9
     JOSHUA ARDOLF, ANTHONY BALDWIN,
     BUDDY KRUEGER, JACOB MADDEN, and
10
     JNANA VAN OIJEN,
                           Plaintiffs.
11
12
                   -against-
13
     BRUCE WEBER,
14
                           Defendant.
15
                  30 Rockefeller Plaza
                  New York, New York
16
                  Monday, September 23, 2019
17
                  10:06 a.m.
18
19
        Videotaped 30(b)(6) Deposition of
     Little Bear Inc. by JONATHAN BERNSTEIN, a
20
     Witness in the above-entitled action,
    held at the above time and place, taken
21
    before Dawn Matera, a Shorthand Reporter
     and Notary Public of the State of New
22
    York.
2.3
24
     JOB NO. 3518445-1
2.5
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               (Via Teleconference)
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     Also Present:
15
         ELIZABETH MURPHY,
             Little Bear
16
17
         HOWARD BRODSKY,
             Videographer
18
                      ~000~
19
20
21
22
23
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25
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4	MS. LEVINE-GRONNINGSATER	10
-	MR. ETRA	188
5	MR. EIRA	100
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1				
3 A. There is no reason. 10:09:42 4 Q. Did you discuss this deposition 10:09:44 5 Deforehand with anyone other than your 10:09:48 6 attorneys? 10:09:51 7 A. Yes. 10:09:51 7 A. Yes. 10:09:51 7 A. Yes. 10:09:51 7 A. Yes. 10:09:51 7 A. I discussed it with - to the 10:09:53 7 A. I discussed it with - to the 10:09:53 7 A. I discussed it with - to the 10:09:53 7 A. I discussed it with - to the 10:09:51 7 Did to extent that fide research and due 10:09:59 10 diligence on the 30(b)(6) topics, I've 10:10:01 12 Spoken to probably about 20 people. 10:10:03 12 Certainly. That's fine. 10:12:11 13 Mould you like me to name them? 10:10:15 16 A. Either at present or at some 10:10:15 16 A. Either at present or at some 10:10:15 16 Ewith Probably who are not. 10:10:24 16 A. Either at present or at some 10:10:15 16 Wata's in front of you. We will 10:12:18 10:12:19 10:10:30 10:12:31 10:12:32 16 A. Can try for sure. 10:10:30 16 Websel to Bear? 10:10:30 16 Websel to Bear to Websel to Bear	1	, ,	1	
4 Q. Did you discuss this deposition 10.09-44 4 you verify some discovery responses that 10.12:00 6 attorneys? 10.09-51 7 A. Yes. 10.09-51 7 A. Yes. 10.09-51 7 A. Yes. 10.09-51 7 A. Yes. 10.09-51 7 A. I discussed it with −10 the 10.09-53 9 to me at a break and we can talk about 10.12:04 10.12:04 10.12:05 10.12	2		2	-
5 beforehand with anyone other than your 10:09:48 6 attorneys? 10:09:51 7 A. Yes. 10:09:51 7 A. Yes. 10:09:53 8 Q. Who did you discuss it with? 10:09:53 9 A. I discussed it with — to the 10:09:53 9 to me at a break and we cun talk about 10:12:06	3		3	
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Page 15 Page 17	25	A. As far as I understand, yes. 10:11:49	25	any? 10:13:55
<u> </u>	1	Page 15		Page 17

1	the objection that Ms. Murphy is more 10:25:52	1	A. Mr. Weber is an independent 10:27:03
2	equipped to speak on that topic? 10:25:54	2	contractor. He's not part of the 10:27:05
3	MR. ETRA: That's part of it. 10:25:55	3	hierarchy. So the concept of rank 10:27:07
4	MR. FUDALI: Or objection that 10:25:56	4	doesn't really apply. 10:27:09
5	it's attorney/client privilege or is 10:25:57	5	Q. Is the answer then no one? 10:27:10
6	it both? 10:25:58	6	A. The answer is everyone. 10:27:15
7	MR. ETRA: It's both. 10:25:58	7	Q. Does Mr. Weber ever communicate 10:27:17
8	MR. FUDALI: Thank you. 10:26:00	8	with models through a Little Bear e-mail 10:27:27
9	MS. LEVINE-GRONNINGSATER: And 10:26:00	9	address? 10:27:30
10	are you instructing him not to answer? 10:26:01	10	A. Yes. 10:27:30
11	MR. ETRA: I am instructing him 10:26:03	11	Q. Does he ever communicate with 10:27:31
12	not to answer anything that he only 10:26:04	12	them through an e-mail address that is 10:27:32
13	knows from being part of the 10:26:06	13	not belonging to Little Bear? 10:27:34
14	attorney/client privilege team. If he 10:26:07	14	A. Not to my knowledge, no. 10:27:36
15	has knowledge incidental because he 10:26:09	15	Q. Is there a human resources 10:27:37
16	hung out in the studio and has 10:26:12	16	department at Little Bear? 10:27:43
17	personal knowledge he's picked up 10:26:13	17	A. There is not a separate human 10:27:44
18	along the way, I am not stopping him 10:26:16	18	resources department. I manage the human 10:27:46
19	from answering. 10:26:17	19	resources function. 10:27:48
20	MS. LEVINE-GRONNINGSATER: I 10:26:17	20	Q. Does anyone else work with you 10:27:49
21	don't think that's how attorney/client 10:26:17	21	in a human resources function? 10:27:52
22	privilege works. If he has knowledge 10:26:19	22	A. No. 10:27:54
23	of it, I am not asking him the source 10:26:19	23	Q. And how are you trained in 10:27:54
24	of that knowledge, but if he has 10:26:21	24	human resources, if at all? 10:27:59
25	knowledge, he can not refuse to 10:26:22	25	A. I am not formally trained in 10:28:01
	Page 30		Page 32
1	testify on it based on the fact that 10:26:23	1	human resources. 10:28:04
2	he got knowledge from an attorney. 10:26:24	2	Q. Have you ever been formally 10:28:05
3	MR. ETRA: Oh, I disagree. 10:26:26	3	trained? 10:28:11
4	MS. LEVINE-GRONNINGSATER: Well, 10:26:27	4	A. I have never I have no 10:28:11
5	Upjohn would agree with me. Maybe we 10:26:29	5	formal training in human resources. I 10:28:14
6	can 10:26:31	6	have you know, I've worked as a 10:28:16
7	MR. ETRA: What? 10:26:31	7	controller for the last 16, 18 years of 10:28:18
8	MS. LEVINE-GRONNINGSATER: 10:26:32	8	my career at different places. I have 10:28:21
9	Upjohn would agree with me. 10:26:32	9	overseen a human resources department. I 10:28:24
10	MR. ETRA: Upjohn just means 10:26:33	10	mean, you know, I would say that I 10:28:30
11	it's the privilege of the company. It 10:26:33	11	mean, I certainly acknowledge that I have 10:28:35
12	doesn't mean it's not a privilege. 10:26:35	12	no formal training. But I am able to 10:28:37
13	MS. WEINTRAUB: You want all of 10:26:40	13	address human resource needs as they 10:28:39
14	this on the record? 10:26:41	14	arise, and, you know, anything that comes 10:28:41
15	MR. ETRA: Yeah, I do. 10:26:42	15	up that's outside my capacity to address, 10:28:44
16	MR. FUDALI: Sure. Just ask the 10:26:43	16	I would refer to counsel. 10:28:47
17	question again. Let's move on. 10:26:45	17	Q. Is this inside counsel or 10:28:49
18	Q. Who outranks Mr. Weber in 10:26:49	18	outside counsel? 10:28:55
19	casting, if anyone? 10:26:52	19	A. Outside counsel. Little Bear 10:28:56
20	MR. ETRA: Same objection. 10:26:54	20	has eight employees, we don't have inside 10:29:00
21	If you know from your personal 10:26:54	21	counsel. 10:29:03
22	knowledge, you can answer. If you 10:26:56	22	Q. And how many independent 10:29:04
23	know simply from being part of the 10:26:58	23	contractors does Little Bear have? 10:29:07
24	legal team, I instruct you not to 10:27:00	24	A. Well, the number changes at any 10:29:08
25	answer. 10:27:03	25	given moment in time. 10:29:12
	Page 31		-

1	Q. Right now? 10:29:13	1	what I would have in my own records and 10:32:11
2	A. Right now there are four or 10:29:14	2	see. My recollection of the policy was 10:32:13
3	five independent contractors currently 10:29:21	3	that it was several pages. 10:32:15
4	engaged. 10:29:24	4	Q. Did you review any documents 10:32:16
5	Q. Does Little Bear have sexual 10:29:24	5	related to the sexual harassment before 10:32:23
6	harassment training for employees? 10:29:36	6	this deposition? 10:32:26
7	A. We've signed up for you 10:29:38	7	A. Specifically in preparation for 10:32:28
8	know, I understand that there is a new 10:29:42	8	the 30(b)(6), no. 10:32:29
9	statute in New York, you know, recently 10:29:43	9	Q. Who else at Little Bear would 10:32:30
10	this year that requires, that requires 10:29:46	10	know about the sexual harassment policy? 10:32:40
11	training. 10:29:48	11	A. Hopefully every employee. 10:32:43
12	Prior to that statute, we never 10:29:49	12	Q. Other than this document, does 10:32:45
13	had any we've never had any training. 10:29:51	13	Little Bear have a policy, program and 10:32:58
14	And I signed up for a sexual harassment 10:29:55	14	procedure for the detection of sexual 10:33:00
15	training program, which we have yet to 10:30:01	15	harassment at Little Bear? 10:33:02
16	complete. 10:30:04	16	A. Outside of what's in the formal 10:33:04
17	Q. Is there any policy, program or 10:30:04	17	sexual harassment policy, there is no 10:33:10
18	procedure in place for the prevention of 10:30:22	18	other formal policy. 10:33:13
19	sexual harassment at Little Bear? 10:30:24	19	Q. When was this policy, 10:33:21
20	A. There is a sexual harassment 10:30:27	20	Plaintiffs' 23, implemented? 10:33:24
21	policy, yes. 10:30:28	21	A. Probably sometime around 2011 10:33:26
22	Q. I am handing you a document 10:30:29	22	or 2012. 10:33:30
23	marked Plaintiffs' 23. 10:30:43	23	MR. ETRA: I just want to object 10:33:34
24	(Plaintiffs' Exhibit 23,	24	to this line of questions as outside 10:33:36
25	Document Bates stamped LBBW 700, was Page 34	25	the scope of the notice. 10:33:37 Page 36
	-		Tuge 50
1	so marked for identification, as of	1	MR. FUDALI: Wasn't this sexual 10:33:40
2	this date.) 10:31:03	2	harassment policy one of 10:33:42
3	Q. Do you recognize this document? 10:31:03		MR. ETRA: No, it's not in 10:33:43
4	And you can take your time to review it. 10:31:04		there. 10:33:44
5	(Witness reviews document.) 10:31:07	5	MR. FUDALI: What is in there? 10:33:45
6	A. Yes. 10:31:14		
_		6	MR. ETRA: Training. 10:33:46
7	Q. What is it? 10:31:15	7	MS. LEVINE-GRONNINGSATER: 10:33:47
8	Q. What is it? 10:31:15A. It looks like it's the first 10:31:15	7 8	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49
8 9	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17	7 8 9	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51
8 9 10	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18	7 8 9 10	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55
8 9 10 11	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment policy. 10:31:18 Q. And how many pages is the 10:31:19	7 8 9 10 11	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56
8 9 10 11 12	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the 10:31:19 sexual harassment policy? 10:31:21	7 8 9 10 11 12	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59
8 9 10 11 12 13	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24	7 8 9 10 11 12 13	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00
8 9 10 11 12 13 14	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the 10:31:19 sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25	7 8 9 10 11 12 13 14	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02
8 9 10 11 12 13 14 15	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the 10:31:19 sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34	7 8 9 10 11 12 13 14 15	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03
8 9 10 11 12 13 14 15 16	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37	7 8 9 10 11 12 13 14 15 16	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05
8 9 10 11 12 13 14 15 16 17	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37	7 8 9 10 11 12 13 14 15 16 17	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06
8 9 10 11 12 13 14 15 16 17 18	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the 10:31:19 sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37 Q. And is this the policy, program 10:31:38	7 8 9 10 11 12 13 14 15 16 17 18	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06 about policy, program or procedure, we 10:34:08
8 9 10 11 12 13 14 15 16 17 18	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the 10:31:19 sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37 Q. And is this the policy, program 10:31:38 or procedure for the prevention of sexual 10:31:56	7 8 9 10 11 12 13 14 15 16 17 18	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06 about policy, program or procedure, we 10:34:08 would have made sure we had fully 10:34:10
8 9 10 11 12 13 14 15 16 17 18 19 20	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37 Q. And is this the policy, program 10:31:38 or procedure for the prevention of sexual 10:31:56 harassment to which you previously 10:31:58	7 8 9 10 11 12 13 14 15 16 17 18 5 19 20	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06 about policy, program or procedure, we 10:34:08 would have made sure we had fully 10:34:10 prepared answers to this as opposed to 10:34:12
8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment 10:31:17 policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37 Q. And is this the policy, program 10:31:38 or procedure for the prevention of sexual 10:31:56 harassment to which you previously 10:31:58 referred? 10:32:00	7 8 9 10 11 12 13 14 15 16 17 18 5 19 20 21	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06 about policy, program or procedure, we 10:34:08 would have made sure we had fully 10:34:10 prepared answers to this as opposed to 10:34:12 just getting a witness's recollection 10:34:14
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8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. What is it? 10:31:15 A. It looks like it's the first 10:31:15 page of Little Bear's sexual harassment policy. 10:31:18 Q. And how many pages is the sexual harassment policy? 10:31:21 A. I don't remember offhand. 10:31:24 Three or four pages. 10:31:25 Q. Has that been produced in 10:31:34 discovery? 10:31:37 A. I believe so. 10:31:37 Q. And is this the policy, program 10:31:38 or procedure for the prevention of sexual 10:31:58 harassment to which you previously 10:31:58 referred? 10:32:00 A. Yes. 10:32:00 Q. Is there anything else? 10:32:00 A. I don't know offhand. You 10:32:04	7 8 9 10 11 12 13 14 15 16 17 18 5 19 20 21 22 23 24	MS. LEVINE-GRONNINGSATER: 10:33:47 Sexual harassment training. The 10:33:49 topics are the minimum topic to which 10:33:51 the witness must be prepared to 10:33:55 testify. It is not the maximum scope 10:33:56 of what we can ask him. 10:33:59 MR. ETRA: I mean, you can 10:34:00 ask I am not saying you can't ask 10:34:02 him, I am just saying that if I knew, 10:34:03 if I had notice, that's the whole 10:34:05 point of this, that you wanted to know 10:34:06 about policy, program or procedure, we 10:34:08 would have made sure we had fully 10:34:10 prepared answers to this as opposed to 10:34:12 just getting a witness's recollection 10:34:14 when he was preparing for something 10:34:16 else. 10:34:17

1 doing this. I think it's 10.34.23 1 the organization. You know, eight 10.36.29 10.36.29 10.36.29 10.36.29 10.36.23 10.36.25 10	1			
3	1 -	doing this. I think it's 10:34:23	1	the organization. You know, eight 10:36:29
4 professionals. We all take our jobs and 10:36:35 Q. Is anyone at Little Bear in 10:34:32 5 R. A. Nobody at Little Bear in 10:34:42 10 complaints. You know, however, you know, 10:34:42 11 complaints. You know, however, you know, 10:34:42 12 complaints. You know, however, you know, 10:34:45 13 complaints. You know, however, you know, 10:34:45 14 where I have worked, so I do have some 10:34:57 15 experience in this area. 10:34:58 16 Q. Was there an incident or issue 10:34:57 17 that triggered the implementation of this 10:35:11 18 policy? 10:35:13 19 A. No. 10:35:13 19 A. No. 10:35:13 20 MR. ETRA: Same objection. 10:35:15 21 Q. Are Little Bear employees 10:35:18 22 trained not to sexually harass models? 10:35:26 23 A. Trained not to sexually harass 10:35:29 24 models? Q. Yes. 10:35:32 25 Q. Yes. 10:35:32 26 Q. Yes. 10:35:32 27 Q. Yes. 10:35:32 28 pecifically trained in sexual harassment 10:35:45 30 at all. However, you know, the culture 10:35:45 41 for filter Bear, it is a small company, 10:35:47 51 for filter Bear, it is a small company, 10:35:47 51 for filter Bear, it is a small company, 10:35:47 51 for filter Bear, it is a small company, 10:35:52 51 for filter Bear it is a small company, 10:35:52 51 for filter Bear it in a sexual harassment 10:35:52 52 g. Yes. 10:35:37 53:39 54 at 13:11 Repair, it is a small company, 10:35:47 55 for filter Bear it is complex to more 10:35:45 56 of Little Bear it is complex to more 10:35:45 76 har's permissive to any type of 10:35:47 77 har's permissive or or you know, the culture is not one 10:35:52 78 har's you know, formally trained in, 10:36:17 79 you know, any type of sexual harassment 10:36:10 15 that are constantly walking in and out of 10:36:10 15 that are constantly walking in and out of 10:36:10 15 that are constantly walking in and out of 10:36:10 16 title Bear it, becuring in 10:36:12 17 A. Like I said, nobody at Little Bear in 10:36:12 18 pear is, you know, formally trained in, 10:36:12 29 que that sixty and the models 10:36:24 20 que that sixty and the models 1	2	inappropriate. And I think you should 10:34:25	2	people, most of whom who have worked 10:36:31
5 Q. Is anyone at Little Bear 10/34/32 5 our responsibilities seriously, and the 10/36/41 10/36/43 7 time articulating, you know, culture 10/36/47 10/36/53 10	3	use the time on the things that you 10:34:27	3	together for a long time. We're all 10:36:33
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20 prevention. However, the culture is not 10:36:19 20 think, in terms of documents, I think 10:39:08 21 one that would be permissive of sexually 10:36:22 21 that's it. 10:39:10 22 harassing anybody, inside or outside the 10:36:24 22 Q. And when you say contact 10:39:11 23 organization. 10:36:26 23 sheets, can you please define what that 10:39:15 24 Q. How so? 10:36:27 24 is? 10:39:18 25 A. That's just not the culture of 10:36:27 25 A. Sure. So a contact sheet is 10:39:18	3 4 5 6 7 8 9 10 11 12 13 14 15 16	at all. However, you know, the culture 10:35:39 at Little Bear, it's a small company, 10:35:42 there are eight people who are employees 10:35:43 of Little Bear, the culture is not one 10:35:45 that's permissive to any type of 10:35:47 inappropriate behavior or sexual 10:35:49 harassment. 10:35:52 Q. Is it your understanding that 10:35:52 sexual harassment only occurs between 10:36:00 employees and co-employees? 10:36:05 A. No. 10:36:07 Q. So what about all of the models 10:36:08 that are constantly walking in and out of 10:36:10 Little Bear? 10:36:12	3 4 5 6 7 8 9 10 11 12 13 14 15 16	into contact with them at Little Bear and 10:38:09 in Little Bear offices had training in 10:38:11 how to not sexually harass them? 10:38:12 A. Yes. 10:38:15 Q. Are you familiar with Jason 10:38:16 Boyce's photo shoot at Little Bear in or 10:38:33 around 2014? 10:38:37 A. To the extent that I became 10:38:39 aware as a result of this case, yes. 10:38:42 Q. Did you review any documents to 10:38:44 refresh your recollection about 10:38:50 Mr. Boyce's photo shoot in preparation 10:38:55 for this document? 10:38:59 A. Yes. 10:39:00
21 one that would be permissive of sexually 10:36:22 21 that's it. 10:39:10 22 harassing anybody, inside or outside the organization. 10:36:24 22 Q. And when you say contact organization. 10:39:11 23 organization. 10:36:26 23 sheets, can you please define what that organization. 10:39:15 24 Q. How so? 10:36:27 24 is? 10:39:18 25 A. That's just not the culture of organization. 10:39:18 25 A. Sure. So a contact sheet is organization.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	at all. However, you know, the culture at Little Bear, it's a small company, 10:35:42 there are eight people who are employees 10:35:43 of Little Bear, the culture is not one 10:35:45 that's permissive to any type of 10:35:47 inappropriate behavior or sexual 10:35:49 harassment. 10:35:52 Q. Is it your understanding that 10:35:52 sexual harassment only occurs between 10:36:00 employees and co-employees? 10:36:05 A. No. 10:36:07 Q. So what about all of the models 10:36:08 that are constantly walking in and out of 10:36:10 Little Bear? 10:36:12 A. Like I said, nobody at Little 10:36:12	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	into contact with them at Little Bear and 10:38:09 in Little Bear offices had training in 10:38:11 how to not sexually harass them? 10:38:12 A. Yes. 10:38:15 Q. Are you familiar with Jason 10:38:36 Boyce's photo shoot at Little Bear in or 10:38:33 around 2014? 10:38:37 A. To the extent that I became 10:38:39 aware as a result of this case, yes. 10:38:42 Q. Did you review any documents to 10:38:44 refresh your recollection about 10:38:50 Mr. Boyce's photo shoot in preparation 10:38:55 for this document? 10:38:59 A. Yes. 10:39:00 Q. What documents? 10:39:00
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25 A. That's just not the culture of 10:36:27 25 A. Sure. So a contact sheet is 10:39:18	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	at all. However, you know, the culture at Little Bear, it's a small company, 10:35:42 there are eight people who are employees 10:35:43 of Little Bear, the culture is not one 10:35:45 that's permissive to any type of 10:35:47 inappropriate behavior or sexual 10:35:49 harassment. 10:35:52 Q. Is it your understanding that 10:35:52 sexual harassment only occurs between 10:36:00 employees and co-employees? 10:36:05 A. No. 10:36:07 Q. So what about all of the models 10:36:08 that are constantly walking in and out of 10:36:10 Little Bear? 10:36:12 A. Like I said, nobody at Little 10:36:12 Bear is, you know, formally trained in, 10:36:15 you know, any type of sexual harassment 10:36:17 prevention. However, the culture is not 10:36:22	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	into contact with them at Little Bear and 10:38:09 in Little Bear offices had training in 10:38:11 how to not sexually harass them? 10:38:12 A. Yes. 10:38:15 Q. Are you familiar with Jason 10:38:36 Boyce's photo shoot at Little Bear in or 10:38:33 around 2014? 10:38:37 A. To the extent that I became 10:38:39 aware as a result of this case, yes. 10:38:42 Q. Did you review any documents to 10:38:44 refresh your recollection about 10:38:50 Mr. Boyce's photo shoot in preparation 10:38:55 for this document? 10:38:59 A. Yes. 10:39:00 Q. What documents? 10:39:00 A. The complaint. The 10:39:01 interrogatories. The contact sheets. I 10:39:02 think, in terms of documents, I think 10:39:08 that's it. 10:39:10
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Page 39 Page 41	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	at all. However, you know, the culture at Little Bear, it's a small company, 10:35:42 there are eight people who are employees 10:35:43 of Little Bear, the culture is not one 10:35:45 that's permissive to any type of 10:35:47 inappropriate behavior or sexual 10:35:52 Q. Is it your understanding that 10:35:52 sexual harassment only occurs between 10:36:00 employees and co-employees? 10:36:05 A. No. 10:36:07 Q. So what about all of the models 10:36:08 that are constantly walking in and out of 10:36:10 Little Bear? 10:36:12 A. Like I said, nobody at Little 10:36:12 Bear is, you know, formally trained in, you know, any type of sexual harassment 10:36:17 prevention. However, the culture is not one that would be permissive of sexually 10:36:24 organization. 10:36:26	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	into contact with them at Little Bear and 10:38:09 in Little Bear offices had training in 10:38:11 how to not sexually harass them? 10:38:12 A. Yes. 10:38:15 Q. Are you familiar with Jason 10:38:16 Boyce's photo shoot at Little Bear in or 10:38:33 around 2014? 10:38:37 A. To the extent that I became 10:38:39 aware as a result of this case, yes. 10:38:42 Q. Did you review any documents to 10:38:44 refresh your recollection about 10:38:50 Mr. Boyce's photo shoot in preparation 10:38:55 for this document? 10:38:59 A. Yes. 10:39:00 Q. What documents? 10:39:00 A. The complaint. The 10:39:01 interrogatories. The contact sheets. I 10:39:02 think, in terms of documents, I think 10:39:08 that's it. 10:39:10 Q. And when you say contact 10:39:11 sheets, can you please define what that 10:39:15
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1	been made? 10:48:09	1	A. Mr. Boyce's portraits? 10:50:16
2	MR. ETRA: Objection. 10:48:10	2	Q. No, do these portraits do 10:50:18
3	A. So again, you know, it is my 10:48:12	l .	Mr. Weber's portraits of models ever end 10:50:19
4	position that Bruce had already agreed to 10:48:15	4	up in an editorial? 10:50:22
5	take the portraits of Jason Boyce. 10:48:16	5	A. You know, it's possible. I 10:50:23
6	Whether or not there was a formal time 10:48:18 scheduled or not, I don't know. 10:48:21	6	guess it depends on, you know, what the 10:50:27
7 8	•	7	understanding is between Mr. Weber and 10:50:28 the subject as to, you know, what the, 10:50:30
	5	8	you know, permissible use of the portrait 10:50:33
9	at Tiffany's scheduled? 10:48:27 A. I don't know. 10:48:29	10	is going to be. 10:50:36
11	Q. Is it common for Mr. Weber to 10:48:30	10	Q. Where did the portrait session 10:50:43
12	meet with a model before a photo shoot 10:48:36	12	take place? 10:50:45
13	like this? 10:48:40	13	A. I understand that it took place 10:50:46
14	MR. ETRA: Objection. 10:48:41		in the studio at 205 Hudson Street. 10:50:48
15	Go ahead. 10:48:43	15	Q. Does Little Bear have offices 10:50:51
16	A. Yes. 10:48:44		at 205 Hudson Street? 10:51:07
17	MS. LEVINE-GRONNINGSATER: Is 10:48:47		A. Yes. 10:51:09
18	the objection that I am calling it a 10:48:47	18	Q. What floor? 10:51:09
19	photo shoot and not a portrait 10:48:49	19	A. The tenth floor. 10:51:11
20	session? 10:48:52	20	Q. Is that where the portrait 10:51:12
21	MR. ETRA: That's my objection. 10:48:52	21	session took place? 10:51:19
22	MS. LEVINE-GRONNINGSATER: 10:48:54		A. Yes. 10:51:20
23	Understood. 10:48:54	23	Q. And can you describe the layout 10:51:21
24	MR. ETRA: I know you know that. 10:48:54	24	of the tenth floor? 10:51:28
25	Q. Is it common for Mr. Weber to 10:48:56	25	A. Of the whole floor? 10:51:30
	Page 50		Page 52
1	meet with models like this before a 10:48:58	1	MR. ETRA: You mean Little 10:51:35
2	portrait session? 10:49:00	2	Bear's space in the floor? 10:51:36
3	A. Yes, absolutely. In fact, I 10:49:00	3	MS. LEVINE-GRONNINGSATER: 10:51:38
4	would be surprised if he didn't. 10:49:02	4	Actually, I would appreciate even an 10:51:39
5	Q. So given the recent objections, 10:49:04	5	overview. 10:51:40
6	what kind of photo shoot took place 10:49:26	6	Q. When you go to 205 Hudson and 10:51:42
7	between Mr. Weber and Mr. Boyce? 10:49:29	7	you go to the tenth floor, the elevator 10:51:44
8	MR. ETRA: I am just going to 10:49:32		opens, what's there? 10:51:46
9	object, but go ahead. I am objecting, 10:49:33	9	A. So there are different 10:51:48
10	I am not arguing with you. 10:49:37	10	working it's an office building. It's 10:51:50
11	A. I understand it to have been a 10:49:38	11	a standard downtown office building. So 10:51:52
12	portrait session. 10:49:40	12	when you get out of the elevator on the 10:51:54
13	Q. And what is a portrait session? 10:49:41	13	tenth floor, the Little Bear suite is 10:51:56
14	A. It's where a photographer takes 10:49:43	14	directly in front of you and there are 10:51:57
15	a portrait of a subject. 10:49:47 Q. And does Mr. Weber commonly 10:49:48	15	other suites and work spaces, you know, 10:51:59 throughout the floor. 10:52:02
17	take portraits of subjects? 10:49:54	16 17	Q. And thank you. 10:52:03
18	A. From time to time, sure. 10:49:55	18	And so can you please describe 10:52:06
19	Q. And did these portraits ever 10:49:58	19	the Little Bear suite? 10:52:09
20	end up in a book? 10:50:03	20	A. Sure. It's about 10,000 square 10:52:10
21	A. That's a possibility. 10:50:06	21	feet. It's divided into, you know, a 10:52:12
22	Q. One of Mr. Weber's books? 10:50:08	22	couple of different sections. There 10:52:18
23	A. That is a possibility. 10:50:11	23	are there is a place where people 10:52:23
24	Q. Do these portraits ever end up 10:50:12	24	work. There is a place where it's an 10:52:25
	in an editorial? 10:50:14	25	archive space. So there is an area that 10:52:30
23	Page 51		Page 53

1			
1	A. So the .tif indicates a tif 11:27:57	1	they kept? By model, by date, by 11:30:27
2	file, which is an image format file. 11:28:02	2	location? None of the above, all of the 11:30:30
3	67185 is a reference to an invoice number 11:28:05	3	above? 11:30:32
4	from the lab. I think, you know, we also 11:28:07	4	A. All of the above. So there is 11:30:33
5	at times call it a job number. And the 11:28:10	5	a database. And information about, you 11:30:35
6	dash 1, dash 2 and dash 3 indicate which 11:28:14	6	know, this particular, these particular 11:30:39
7	roll in that job. 11:28:17	7	roles would have been, you know, kept in 11:30:41
8	Q. So I will represent to you that 11:28:19	8	the database. And it may not have 11:30:43
9	I've seen other contact sheets with 11:28:21	9	indicated an exact date, but it probably 11:30:46
10	titles of the location of the shoot or 11:28:24	10	would have at least said December 2014. 11:30:48
11	session and the name of the model. Do 11:28:28	11	In fact I imagine that it probably does. 11:30:51
12	you know why this contact sheet doesn't 11:28:31	12	And I can check, but and I am sure I 11:30:53
13	have that information? 11:28:33	13	looked in, you know, in the course of 11:30:56
14	A. Whoever you know, whoever 11:28:35	14	doing this work, but I would imagine it 11:30:58
15	produced this for me as a scan, you know, 11:28:38	15	probably just says, you know, December 11:31:00
16	just didn't put that title on the top. 11:28:41	16	2014, because in the time that it takes 11:31:03
17	And I had asked somebody in the archive 11:28:44	17	for the film to be processed and then the 11:31:06
18	department I actually, when I first 11:28:46	18	contact sheets to be you know, to be 11:31:09
19	did my due diligence on the case, not in 11:28:49	19	returned, some time has passed. So it's 11:31:11
20	30(b)(6) preparation, I actually had 11:28:52	20	a little while before it actually gets 11:31:13
21	referred to the original contact sheets, 11:28:56	21	entered into, you know, into the 11:31:15
22	which are, you know, photographic prints. 11:28:59	22	database. 11:31:18
23	And it was just how it was scanned by 11:29:07	23	Also, the contact sheets would 11:31:18
24	whoever I was asked to scan it. 11:29:08	24	have been kept in a separate envelope. 11:31:21
25	It's even possible that the 11:29:10	25	And I mean like a clear envelope. And 11:31:26
	Page 70		Page 72
1	file name designation on the bottom might 11:29:12	1	there was probably a post-it that read 11:31:31
2	have even come from Mr. Brown's office 11:29:14	2	December 2014. 11:31:33
3	have even come from Mr. Brown's office 11:29:14 and not from me. 11:29:18	2 3	December 2014. 11:31:33 Q. Got it. And who would have 11:31:36
3	and not from me. 11:29:18	3	Q. Got it. And who would have 11:31:36
3 4	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21	3 4 5	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42
3 4 5	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30	3 4 5	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43
3 4 5 6	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35	3 4 5 6	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44
3 4 5 6 7	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37	3 4 5 6 7 8	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46
3 4 5 6 7 8	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39	3 4 5 6 7 8	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51
3 4 5 6 7 8 9	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42	3 4 5 6 7 8 9 10	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56
3 4 5 6 7 8 9 10 11 12	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44	3 4 5 6 7 8 9 10 11 12	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57
3 4 5 6 7 8 9 10 11	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46	3 4 5 6 7 8 9 10 11 12 13	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59
3 4 5 6 7 8 9 10 11 12	and not from me. 11:29:18 Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58	3 4 5 6 7 8 9 10 11 12 13 14	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59
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3 4 5 6 7 8 9 10 11 12 13 14 15 16	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. 11:30:04	3 4 5 6 7 8 9 10 11 12 13 14	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:28 A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. 11:30:05 portrait session occurred? 11:30:06	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:30:00 MR. ETRA: Objection. 11:30:04 Q. Can you confirm when this 11:30:05 portrait session occurred? 11:30:06 A. I have a general idea, but, you 11:30:07	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12 Q. And who paid for the prints? 11:32:13
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and not from me. Q. Fair enough. And this contact sheet, which was scanned, is in Little Bear's archives at 205 Hudson? A. Yes. Can I just clarify? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. Q. Can you confirm when this 11:30:05 portrait session occurred? 11:30:06 A. I have a general idea, but, you 11:30:07 know, I can't say with certainty that it 11:29:21	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:13 A. Little Bear paid for the 11:32:15
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	and not from me. Q. Fair enough. And this contact sheet, which was scanned, is in Little Bear's archives at 205 Hudson? A. Yes. Can I just clarify? Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. Q. Can you confirm when this 11:30:05 portrait session occurred? 11:30:06 A. I have a general idea, but, you 11:30:12 took place on, you know, December 15th, 11:30:15	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12 Q. And who paid for the prints? 11:32:13 A. Little Bear paid for the 11:32:15
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. 11:30:04 Q. Can you confirm when this 11:30:06 A. I have a general idea, but, you 11:30:12 took place on, you know, December 15th, 11:30:15 2014. 11:30:17	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12 Q. And who paid for the prints? 11:32:13 A. Little Bear paid for the 11:32:15 prints. 11:32:15
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and not from me. Q. Fair enough. And this contact sheet, which was scanned, is in Little Bear's archives at 205 Hudson? A. Yes. Can I just clarify? Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:29:58 session occurred? 11:30:00 MR. ETRA: Objection. Q. Can you confirm when this 11:30:05 portrait session occurred? 11:30:06 A. I have a general idea, but, you 11:30:07 know, I can't say with certainty that it 11:30:15 2014. Q. Sorry, so it's not a trick 11:30:18 question. I am just wondering in terms 11:30:19	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12 Q. And who paid for the prints? 11:32:13 A. Little Bear paid for the 11:32:15 prints. 11:32:15 Q. And who paid for the 11:32:16 messengering of the contact sheet and the 11:32:18 prints? 11:32:19
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	and not from me. Q. Fair enough. And this contact 11:29:21 sheet, which was scanned, is in Little 11:29:23 Bear's archives at 205 Hudson? 11:29:30 Q. Please. 11:29:35 A. This particular contact sheet 11:29:37 might be at my office at 130 Watts Street 11:29:39 right now, but it was when I retrieved it 11:29:42 at 205 Hudson Street. 11:29:44 Q. Understood. Thank you. So how 11:29:46 can you confirm when this portrait 11:30:00 MR. ETRA: Objection. 11:30:04 Q. Can you confirm when this 11:30:05 portrait session occurred? 11:30:06 A. I have a general idea, but, you 11:30:07 know, I can't say with certainty that it 11:30:15 2014. 11:30:17 Q. Sorry, so it's not a trick 11:30:18	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Got it. And who would have 11:31:36 written on that post-it? 11:31:42 A. Any number of people who worked 11:31:43 in the archive department at the time 11:31:44 that it was catalogued. 11:31:46 Q. And what happened to the prints 11:31:48 ordered from the lab? 11:31:49 A. Those prints would have been 11:31:51 sent to Jason Kanner. 11:31:56 Q. Do you know when they were 11:31:57 sent? 11:31:59 A. I don't. 11:31:59 Q. And do you know who sent them? 11:32:03 A. I don't know who specifically 11:32:04 sent them, but it most likely would have 11:32:10 been a photo assistant. 11:32:12 Q. And who paid for the prints? 11:32:13 A. Little Bear paid for the 11:32:15 prints. 11:32:15 Q. And who paid for the 11:32:16 messengering of the contact sheet and the 11:32:18

1	Q. Did anyone pay Mr. Weber for 11:32:20	1	it appears to be text that was captured 11:35:02
2	his time? 11:32:25	2	from the Bruce Weber website. 11:35:04
3	A. No. 11:32:26	3	Q. If I give you time, perhaps 11:35:06
4	Q. So the next category that I 11:32:27	4	during a break, to review the text, will 11:35:09
5	want to ask you about seems out of order, 11:32:36	5	you be able to authenticate it? 11:35:12
6	but it's the order that I got from your 11:32:39	6	A. I don't know. Would I have to 11:35:14
7	counsel and I don't mind if you don't. 11:32:41	7	compare to what's on the website word for 11:35:17
8	Mr. Weber's prominent status and 11:32:45	8	word? 11:35:19
9	influence in the male modeling industry. 11:32:47	9	MS. WEINTRAUB: Let's discuss it 11:35:22
10	Is Mr. Weber an influential 11:33:00	10	on a break. 11:35:23
11	figure in the male modeling world? 11:33:02	11	MR. ETRA: You can ask him 11:35:23
12	A. I mean, I would imagine yes. 11:33:06	12	factual questions, but, I mean, I 11:35:24
13	But I really can't comment. You know, 11:33:09	13	don't know that he can. I don't know 11:35:26
14	Little Bear is a production company. 11:33:10	14	that he can't. But I don't mind you 11:35:28
15	And, you know, Bruce is a photographer. 11:33:12	15	asking questions. But in terms of 11:35:30
16	I mean, I can't specifically comment on 11:33:14	16	tasks, we have to figure out. 11:35:31
17	like the male modeling world as a 11:33:16	17	THE WITNESS: Is this something 11:35:34
18	separate, as an industry that's distinct 11:33:19	18	that we produced? 11:35:36
19	from fashion photography or production. 11:33:22	19	MS. LEVINE-GRONNINGSATER: No, I 11:35:39
20	Q. Does Little Bear work with 11:33:24	20	will represent to you that it's not. 11:35:39
21	other photographers? 11:33:26	21	I will represent to you 11:35:41
22	A. It has. But for the most part, 11:33:28	22	MR. BROWN: Can you represent to 11:35:42
23	no. 11:33:32	23	him where it's from? 11:35:42
24	Q. At this time are there any 11:33:32	24	Q. I will represent to you that I 11:35:43
25	other independent contractors working for 11:33:37	25	printed it from Mr. Weber's website, the 11:35:45
	Page 74		Page 76
1	Little Bear who are photographers? 11:33:40	1	"About" page. 11:35:52
2	A. No. 11:33:42	2	A. Okay. 11:35:53
3	Q. I believe you saw this document 11:33:42	3	Q. So you don't have to review it 11:35:54
4	last week that I am marking as 11:33:56	4	now. Just to clarify, your position is 11:35:55
5	Plaintiffs' 25. 11:33:58	5	that you are not prepared or qualified to 11:36:04
6	MR. BROWN: Was it previously 11:34:03	6	discuss Mr. Weber's influence in the male 11:36:06
7	marked? 11:34:05	7	modeling industry? 11:36:12
8	MR. FUDALI: I believe it was 11:34:07	8	MR. BROWN: Objection. That's 11:36:12
9	marked and unmarked. 11:34:09	9	not what he said. 11:36:15
10	Q. I am going to show a copy to 11:34:09	10	A. I can talk about fashion the 11:36:19
11	your counsel, because I only have one 11:34:11	11	industry of fashion photography or 11:36:21
12	extra and then I am going to ask that to 11:34:14	12	photography or production. But male 11:36:25
13	be marked by the reporter. 11:34:15	13	modeling as a distinct industry, I mean, 11:36:33
14	MR. ETRA: So this is the only 11:34:18	14	you know, I can't say that I am familiar 11:36:35
15	copy you have. We'll manage. If I 11:34:20	15	with male modeling as a distinct 11:36:37
16	have an issue, I will raise it. Let 11:34:22	16	industry. 11:36:39
17	me just take a quick look. 11:34:24	17	MR. BROWN: Just to be clear, I 11:36:39
18	(Plaintiffs' Exhibit 25, Text	18	want to make clear that he is prepared 11:36:40
19	from Bruce Weber website, was so	19	to talk today about category number 9. 11:36:42
20	marked for identification, as of this	20	I want to make sure you're not 11:36:47
21	date.) 11:34:50	21	understanding his answer something 11:36:49
22	Q. Do you recognize this document, 11:34:50	22	other than that. 11:36:50
23	Mr. Bernstein? 11:34:54	23	MS. LEVINE-GRONNINGSATER: I am 11:36:51
24	A. I don't. It's not something I 11:34:55	24	understanding that his testimony 11:36:51
25	produced. It appears to be I see that 11:34:57	25	MR. BROWN: Then I think you 11:36:53
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3 testified to. 11:49:44 3 conducted the breathing exercises with? 11:5:57 4 Q. Have you ever observed 11:49:44 4 A. He may have, I just don't 11:51:57 5 Mr. Weber conducting a breathing 11:49:48 5 recall. 11:52:01 6 exercise? 11:49:50 6 Q. Did he tell you if he touches 11:52:03 7 A. I have not. 11:49:50 7 them on the chest? 11:52:03 8 Q. Has anyone from Little Bear? 11:49:51 8 A. I believe that that's 11:52:03 9 A. I don't know. 11:49:52 9 specifically what he modifies in doing a 11:5	51:52 51:56 1 1 12:06 52:08 :10
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11.) What I mean by that is, you know, not 11.50.70 11.5 Wh. Weber ien you man he mornies me	32.16
16 necessarily, you know, alone in a 11:50:22 16 breathing exercises for women? 11:52:	.18
17 secluded space. But, you know, the 11:50:25 17 A. Yes. 11:52:19	
18 object is to have some level of 11:50:29 18 Q. How so? 11:52:20	
19 concentration between he and the other 11:50:33 19 A. That he neither instructs them 11:52:2	
20 person. So in a more public setting that 11:50:34 20 to or assists them in touching their 11:52:2	.7
21 is less practical. 11:50:38 21 chest. 11:52:30	
22 Q. In preparation for this 11:50:40 22 Q. Why? 11:52:30	
23 deposition, did you talk to any other 11:50:42 23 A. Because I would say that the 11:52:3	30
24 did you ask anyone if they had seen 11:50:47 24 chest is a private area, that he would 11:52:3	33
25 Mr. Weber conduct his breathing 11:50:49 25 find that to be inappropriate. 11:52:36	
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1 exercises? 11:50:51 1 Q. Did he tell you where else he 11:52:3	38
	:52:44
3 Q. Did anyone tell you that they 11:50:52 3 breathing exercises? 11:52:46	
4 had seen him conduct the breathing 11:50:54 4 A. Just the head, the stomach and 11:52:	48
5 exercises? 11:50:55 5 the core. And not necessarily that he 11:52:	:51
6 A. No. 11:50:56 6 touches, but, you know, where he will 11:5	
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7 Q. Does Mr. Weber conduct the 11:50:56 7 either guide or instruct. But, yes, 11:52:55	
7 Q. Does Mr. Weber conduct the 11:50:56 7 either guide or instruct. But, yes, 11:52:55 8 breathing exercises with female models? 11:51:11 8 those three areas. 11:52:59	5
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1. Q. Does he kiss hem on the mouth 11:53:59 3 Q. Does he puth his fingers in 11:53:59 4 their mouth? 11:54:01 5 A. No. 11:54:02 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 8 models? 11:54:18 11:56:57 7 he was doing breathing exercises with 11:54:18 11:56:59 11:56:59 11:56:59 11:56:59 11:57:07 11:57:07 11:57:07 11:57:08 11:57:09				
3 A. Because they could, you know, 1.56-44 4 their mouth? 11.54-01 5 A. No. 11.54-01 5 A. No. 11.54-01 5 A. No. 11.54-01 5 A. No. 11.56-47 6 Q. Did anyone at Little Bear know 11.54-13 7 this case. 11.56-15 8 models? 11.55-18 11.56-17 8 models? 11.54-13 11.56-17 8 models? 11.54-18 11.56-18 11.56-17		Q. Does he kiss them on the mouth? 11:53:56		
their mouth?	2	A. No. 11:53:58	2	Q. Why is that? 11:56:40
5 A. No. 11:54-02 6 Q. Did anyone at Little Bear know 11:54-13 8 models? 11:54-13 10 Little Bear what they knew. 1 don't 11:54-16 11 know. 11:54-18 12 Q. Did Little Bear ever receive a 11:54-18 13 complaint about Mr. Weber's breathing 11:54-30 14 exercises? 11:54-33 15 A. Newr. 11:54-33 16 Q. Did Little Bear know that 11:54-33 17 Mr. Weber would meet with models alone? 11:54-33 18 A. Yes. 11:54-33 19 Q. Did anyone from Little Bear 11:54-34 18 A. Yes. 11:54-33 19 Q. Did anyone from Little Bear 11:54-34 19 Q. Did anyone from Little Bear 11:54-35 10 Little Bear ever receive a 11:54-35 11:54-32 12 A. No. And I mean, you know, in 11:54-35 13 the mean and nobody has ever 11:54-35 14 the real since and nobody has ever 11:55-04 15 dunderstood, that in the context of doing in swork, that's 11:55-37 17 meet alone and nobody has ever 11:55-16 18 is work, there are times that two people 11:55-16 19 Q. Did manyone from Rittle Bear 11:55-16 10 meet alone and nobody has ever 11:55-16 11 meet alone and nobody has ever 11:55-17 12 complained, so I would have no reason to 11:55-15 13 ever, you know, think that there is 11:55-16 14 anything sinister about Mr. Weber being 11:55-16 15 ever, you know, think that there is 11:55-16 16 Q. Knowing that models have 11:55-34 17 complained about the breathing exercises 11:55-34 18 to this day has anyone at Little Bear 11:55-16 19 Q. Romonig that models have 11:55-34 10 Q. So no one has instructed him to 11:55-55 11 take the Now, think that there is 11:55-40 12 Little Bear 11:55-42 13 the way you feel appropriate. 11:55-54 14 A. The only models who have 11:58-32 15 question. 11:55-52 16 Q. Converging the models have 11:55-34 16 Q. So no one has instructed him to 11:56-15 17 A. Eachly how I, you know, 11:55-53 18 take the continuity of the models who have complained about the breathing exercises 11:57-35 11:57-35 11:57-35 11:57-35 11:57-35 11:57-36 11:57-37 11:57-37 11:57-37 11:57-37 11:57-38 11:57-39 11:57-39 11:57-30 11:57-30 11:57-30 11:57-30 11:57-30 11:57-30 11:57-30 11:57-30 11:57-30	3		3	A. Because they could, you know, 11:56:41
6	4	their mouth? 11:54:01	4	be misconstrued, either by, you know, 11:56:44
7	5	A. No. 11:54:01	5	Plaintiffs or attorneys into something, 11:56:47
8	6	Q. Did anyone at Little Bear know 11:54:02	6	you know, sinister, as we're seeing in 11:56:49
9	7	he was doing breathing exercises with 11:54:11	7	this case. 11:56:57
10 Little Bear what they knew. I don't 11:54:18 11 M. Correct. 11:57:07 11:57:05 11:57:05 12 Q. Did Little Bear ever receive a 11:54:18 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12:57:0	8	models? 11:54:13	8	Q. But not because Little Bear 11:56:57
11 12 13 13 14 15 15 15 15 15 15 15	9	A. I didn't ask everybody at 11:54:13	9	finds the touching in itself 11:56:59
12 Q. Did Little Bear ever receive a 11:54:18 12 Q. Has Little Bear talked to any 11:57:05	10	Little Bear what they knew. I don't 11:54:16	10	inappropriate? 11:57:03
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14 exercises?	12	Q. Did Little Bear ever receive a 11:54:18	12	Q. Has Little Bear talked to any 11:57:05
15	13	complaint about Mr. Weber's breathing 11:54:30	13	model other than Josh Truesdell about the 11:57:20
16 Q. Who? 11:57:24 17 Mr. Weber would meet with models alone? 11:54:48 18 A. Yes. 11:54:49 19 Q. Did anyone from Little Bear 11:54:49 11:57:26 11:57:28 11:57:30 11:57:33 11:57:33 11:57:33 11:57:35 11:57:35 11:57:35 11:57:35 11:57:35 11:57:35 11:57:37 1	14	exercises? 11:54:32	14	breathing exercises? 11:57:22
17 Mr. Weber would meet with models alone? 11:54:48 17 A. I don't know if I can name a 11:57:24 18 A. Yes. 11:54:49 18 list off the top of my head. I don't 11:57:26 20 ever ask him what he did with the models 11:54:49 20 provided. I mean, I can answer – I know 11:57:30 21 when he was alone? 11:54:55 21 that we have, but I just can't tell you 11:57:33 22 A. No. And I mean, you know, in 11:54:56 22 right now off the top of my head. 11:57:35 24 understood, that in the context of doing bis work, there are times that two people 11:55:07 24 any of the models who have complained. 11:57:42 25 bis work, there are times that two people 11:55:10 24 any of the models who have complained. 11:57:42 2 complained, so I would have no reason to alone and nobody has ever 11:55:10 2 complained about the breathing exercises. 11:57:48 3 ever, you know, think that there is alone in a room with anybody. 11:55:16 3 are the Plaintiffs in these two actions, 11:57:52 11:57:54 4 or bis day has anyone at Little Bear I is 54:40 11:55:45 5 other person who is named in the New York I is 57:59 11:57:59 5 lance in a room with anybody. 11:55:34	15	A. Never. 11:54:33	15	A. Yes. 11:57:24
18	16	Q. Did Little Bear know that 11:54:33	16	Q. Who? 11:57:24
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23 Q. And has Little Bear spoken to 11:57:37	21	when he was alone? 11:54:54	21	that we have, but I just can't tell you 11:57:33
24 understood, that in the context of doing bits work, there are times that two people bits work with any body bits bits work, there are times that two people bits bits work, there are times that two people bits bits work, there are times that two people bits bits work, there are times that two people bits bits work work bits work work bits work work bits work work bits work and potentially one breathing carcisos. 11:55:54 bits day has anyone at Little Bear bits bits bits day has anyone at Little Bear bits bits bits bits day has anyone at Little Bear bits bits bits bits day has anyone at Little Bear bits bits bits bits bits bits bits bits	22	A. No. And I mean, you know, in 11:54:56	22	right now off the top of my head. 11:57:35
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Page 94 Page 94 Page 96 Page 96	24	understood, that in the context of doing 11:55:05	24	any of the models who have complained 11:57:42
1 meet alone and nobody has ever 11:55:10 2 complained, so I would have no reason to 11:55:15 3 ever, you know, think that there is 11:55:15 4 anything sinister about Mr. Weber being 11:55:18 4 as far as I know, and potentially one 11:57:54 4 as far as I know, and potentially one 11:57:57 5 other person who is named in the New York 11:57:57 6 Q. Knowing that models have 11:55:34 6 Times article. And no, we haven't spoken 11:57:59 7 complained about the breathing exercises 11:55:40 8 MR. ETRA: Other than 11:58:12 9 talked to Mr. Weber about them? 11:55:42 10 MR. ETRA: Objection. Breathing 11:55:45 11 Mr. Weber conduct the breathing 11:58:24 11 exercises. 11:55:55 11 Exercises. 11:55:55 12 I am just objecting. You answer 11:55:50 13 employees or independent contractors of 11:58:31 11:58:32 12 question. 11:55:50 13 employees or independent contractors of 11:58:31 12:58:36 13 testified. No different than the 11:56:07 18 But I am not stopping you from 11:58:40 20 A. Yes, relaxation techniques have 11:58:43 21 stop? 11:56:22 22 Row, at Little Bear's direction or 11:58:48 24 don't know if I ever said to him stop, 11:56:34 24 Q. Who? 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56 11:58:66 11:58:66 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56 11:58:66 11:58:48 25 A. On the Abercrombie shoots in 11:58:66 11:58:66 11:58:48 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56 11:58:66 11:58:66 11:58:66 11:58:48 11:58:48 11:58:66 11:58:48 11:58:66 11:58:48 11:58:66 11:58:48 11:58:66 11:58:66 11:58:48 11:58:66 11:58:48 11:58:66 11:58:48 11:58:66 11:58:66 11:58:48 11:58:66 11:58:66 11:58:66 11:58:66 11:58:66 11:58:66 11:58:66 11:58:66 11:58:66 1	25	his work, there are times that two people 11:55:07	25	about the breathing exercises? 11:57:45
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1. Q. Does he kiss hem on the mouth 11:53:59 3 Q. Does he puth his fingers in 11:53:59 4 their mouth? 11:54:01 5 A. No. 11:54:02 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 8 models? 11:54:18 11:56:57 7 he was doing breathing exercises with 11:54:18 11:56:59 11:56:59 11:56:59 11:56:59 11:57:07 11:57:07 11:57:07 11:57:08 11:57:09				
3 A. Because they could, you know, 1.56-44 4 their mouth? 11.54-01 5 A. No. 11.54-01 5 A. No. 11.54-01 5 A. No. 11.54-01 5 A. No. 11.56-47 6 Q. Did anyone at Little Bear know 11.54-13 7 this case. 11.56-15 8 models? 11.55-18 11.56-17 8 models? 11.54-13 11.56-17 8 models? 11.54-18 11.56-18 11.56-17		Q. Does he kiss them on the mouth? 11:53:56		
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6	4	their mouth? 11:54:01	4	be misconstrued, either by, you know, 11:56:44
7	5	A. No. 11:54:01	5	Plaintiffs or attorneys into something, 11:56:47
8	6	Q. Did anyone at Little Bear know 11:54:02	6	you know, sinister, as we're seeing in 11:56:49
9	7	he was doing breathing exercises with 11:54:11	7	this case. 11:56:57
10 Little Bear what they knew. I don't 11:54:18 11 M. Correct. 11:57:07 11:57:05 11:57:05 12 Q. Did Little Bear ever receive a 11:54:18 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12:57:0	8	models? 11:54:13	8	Q. But not because Little Bear 11:56:57
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12 Q. Did Little Bear ever receive a 11:54:18 12 Q. Has Little Bear talked to any 11:57:05	10	Little Bear what they knew. I don't 11:54:16	10	inappropriate? 11:57:03
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14 exercises?	12	Q. Did Little Bear ever receive a 11:54:18	12	Q. Has Little Bear talked to any 11:57:05
15	13	complaint about Mr. Weber's breathing 11:54:30	13	model other than Josh Truesdell about the 11:57:20
16 Q. Who? 11:57:24 17 Mr. Weber would meet with models alone? 11:54:48 18 A. Yes. 11:54:49 19 Q. Did anyone from Little Bear 11:54:49 11:57:26 11:57:28 11:57:30 11:57:33 11:57:33 11:57:33 11:57:35 11:57:35 11:57:35 11:57:35 11:57:35 11:57:35 11:57:37 1	14	exercises? 11:54:32	14	breathing exercises? 11:57:22
17 Mr. Weber would meet with models alone? 11:54:48 17 A. I don't know if I can name a 11:57:24 18 A. Yes. 11:54:49 18 list off the top of my head. I don't 11:57:26 20 ever ask him what he did with the models 11:54:49 20 provided. I mean, I can answer – I know 11:57:30 21 when he was alone? 11:54:55 21 that we have, but I just can't tell you 11:57:33 22 A. No. And I mean, you know, in 11:54:56 22 right now off the top of my head. 11:57:35 24 understood, that in the context of doing bis work, there are times that two people 11:55:07 24 any of the models who have complained. 11:57:42 25 bis work, there are times that two people 11:55:10 24 any of the models who have complained. 11:57:42 2 complained, so I would have no reason to alone and nobody has ever 11:55:10 2 complained about the breathing exercises. 11:57:48 3 ever, you know, think that there is alone in a room with anybody. 11:55:16 3 are the Plaintiffs in these two actions, 11:57:52 11:57:54 4 or bis day has anyone at Little Bear I is 54:40 11:55:45 5 other person who is named in the New York I is 57:59 11:57:59 5 lance in a room with anybody. 11:55:34	15	A. Never. 11:54:33	15	A. Yes. 11:57:24
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1. Q. Does he kiss hem on the mouth 11:53:59 3 Q. Does he puth his fingers in 11:53:59 4 their mouth? 11:54:01 5 A. No. 11:54:02 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 7 he was doing breathing exercises with 11:54:11 8 models? 11:54:18 11:56:57 7 he was doing breathing exercises with 11:54:18 11:56:59 11:56:59 11:56:59 11:56:59 11:57:07 11:57:07 11:57:07 11:57:08 11:57:09				
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6	4	their mouth? 11:54:01	4	be misconstrued, either by, you know, 11:56:44
7	5	A. No. 11:54:01	5	Plaintiffs or attorneys into something, 11:56:47
8	6	Q. Did anyone at Little Bear know 11:54:02	6	you know, sinister, as we're seeing in 11:56:49
9	7	he was doing breathing exercises with 11:54:11	7	this case. 11:56:57
10 Little Bear what they knew. I don't 11:54:18 11 M. Correct. 11:57:07 11:57:05 11:57:05 12 Q. Did Little Bear ever receive a 11:54:18 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12 Q. Bat Little Bear talked to any 11:57:05 11:57:05 12:57:0	8	models? 11:54:13	8	Q. But not because Little Bear 11:56:57
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Page 94 Page 94 Page 96 Page 96	24	understood, that in the context of doing 11:55:05	24	any of the models who have complained 11:57:42
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2 complained, so I would have no reason to 3 ever, you know, think that there is 3 are the Plaintiffs in these two actions, 11:57:52 4 as far as I know, and potentially one 11:57:54 4 as far as I know, and potentially one 11:57:54 5 other person who is named in the New York 11:57:57 6 Times article. And no, we haven't spoken 11:57:59 7 to any of those people. 11:58:02 8 MR. ETRA: Other than 11:58:12 9 depositions. 11:58:13 10 MR. ETRA: Objection. Breathing 11:55:44 10 Q. Does anyone other than 11:58:24 11 my just objecting. You answer 11:55:45 11:55:46 12 question. 11:55:52 11:56:05 13 employees or independent contractors of 11:58:33 14 Little Bear? 11:58:33		Page 94		Page 96
3 ever, you know, think that there is anything sinister about Mr. Weber being anything sinister about Mr. Weber being all:55:18 3 are the Plaintiffs in these two actions, anything sinister about Mr. Weber being all:55:18 11:55:16 4 as far as I know, and potentially one as I li:57:52 11:57:52 5 alone in a room with anybody. 11:55:21 5 other person who is named in the New York and potentially one as I li:57:57 11:57:57 6 Q. Knowing that models have complained about the breathing exercises. 11:55:34 6 Times article. And no, we haven't spoken any on those people. 11:57:59 7 to this day has anyone at Little Bear to this day has anyone at Little Bear at little Bear and patch the well all little Bear and patch an	1	meet alone and nobody has ever 11:55:10	1	A. The only models who have 11:57:47
4 anything sinister about Mr. Weber being 11:55:18 4 as far as I know, and potentially one 11:57:54 5 alone in a room with anybody. 11:55:21 5 other person who is named in the New York 11:57:57 6 Q. Knowing that models have 11:55:34 6 Times article. And no, we haven't spoken 11:57:59 7 complained about the breathing exercises. 11:55:35 7 to any of those people. 11:58:02 8 MR. ETRA: Other than 11:58:12 9 depositions. 11:58:13 10 MR. ETRA: Objection. Breathing exercises. 11:55:45 10 Q. Does anyone other than 11:58:24 11 exercises. 11:55:45 11 Mr. Weber conduct the breathing 11:58:24 12 I am just objecting. You answer the way you feel appropriate. 11:55:50 13 employees or independent contractors of the person who is named in the New York 11:58:24 11 Mr. Weber conduct the breathing exercises. 11:58:02 11:58:24 12 I am just objection. Breathing the way you feel appropriate. 11:55:46 12 exercises, and by anyone, I mean 11:58:29 13 question. 11:55:55 13 employees or independent contractors of the person who is named in the New York 11:58:31 14 Little Bear's 11:58:32 11:58:32 15 Question.	2	complained, so I would have no reason to 11:55:15	2	complained about the breathing exercises 11:57:48
5 alone in a room with anybody. 11:55:21 5 other person who is named in the New York 11:57:57 6 Q. Knowing that models have 11:55:34 6 Times article. And no, we haven't spoken 11:57:59 7 complained about the breathing exercises, 11:55:35 11:55:40 8 MR. ETRA: Other than 11:58:12 9 talked to Mr. Weber about them? 11:55:42 9 depositions. 11:58:13 10 MR. ETRA: Objection. Breathing exercises. 11:55:45 10 Q. Does anyone other than 11:58:24 11 exercises. 11:55:45 11 Mr. Weber conduct the breathing 11:58:26 12 I am just objecting. You answer the way you feel appropriate. 11:55:50 13 employees or independent contractors of question. 11:58:31 14 A. I'm sorry, can you repeat the (Record read.) 11:56:05 14 Little Bear? 11:58:32 15 question. 11:56:05 16 breathing exercises term is a little part in a little part	3	ever, you know, think that there is 11:55:16	3	are the Plaintiffs in these two actions, 11:57:52
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21 stop? 11:56:22 21 been employed by other people at, you 11:58:43 22 A. Okay. I'm sorry, I didn't 11:56:22 22 know, at Little Bear's direction or 11:58:46 23 realize that that's what you meant. I 11:56:24 23 request. 11:58:48 24 don't know if I ever said to him stop, 11:56:34 24 Q. Who? 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56	19	conversations that I said I've just had. 11:56:11	19	answering the question if you can. 11:58:40
22 A. Okay. I'm sorry, I didn't 11:56:22 22 know, at Little Bear's direction or 11:58:46 23 realize that that's what you meant. I 11:56:24 23 request. 11:58:48 24 don't know if I ever said to him stop, 11:56:34 24 Q. Who? 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56	20	Q. So no one has instructed him to 11:56:14	20	A. Yes, relaxation techniques have 11:58:41
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24 don't know if I ever said to him stop, 11:56:34 24 Q. Who? 11:58:48 25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56	22	A. Okay. I'm sorry, I didn't 11:56:22	22	know, at Little Bear's direction or 11:58:46
25 but certainly we've discussed that it's 11:56:36 25 A. On the Abercrombie shoots in 11:58:56	23	realize that that's what you meant. I 11:56:24	23	request. 11:58:48
•	24	don't know if I ever said to him stop, 11:56:34	24	Q. Who? 11:58:48
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1			
1	all of your answers from Plaintiffs' 26? 12:15:13		would have, you know, been responsible 12:17:31
2	A. I am. 12:15:15	2	for payment. I don't know offhand. But 12:17:33
3	Q. Let's just make it easier and 12:15:16	3	consistent with common practice, you 12:17:35
4	I'll just look at 26 later. 12:15:18	4	know, typically this is a budget that's 12:17:38
5	A. Great. 12:15:19	5	provided by, you know, the client or, you 12:17:40
6	Q. Strike that. In terms of other 12:15:20	6	know, the client or the publication. 12:17:44
7	people at the shoot who aren't Little 12:15:36	7	Typically, Little Bear makes 12:17:46
8	Bear employees and independent 12:15:37	8	
9	contractors, are they all listed in 12:15:38	9	·
10	Plaintiffs' 26? 12:15:39	10	Q. And that's for travel? 12:17:51
11	A. As far as I am aware, they 12:15:40	11	A. That includes travel, yes. 12:17:52
12	would be. I just want to make sure that 12:15:43	12	
13	all of the talent is listed, which the 12:15:44	13	A. Yes. 12:17:55
14	talent is. Yes. 12:15:46	14	
15	Just for clarification, most of 12:15:54	15	-
			A. Wages typically are paid by the 12:18:00
16	the production assistants were most 12:15:56	16	
17	likely not actually there at the time 12:15:58	17	Q. Do you know if there is a 12:18:01
18	well, you know, I don't know. I don't 12:16:00		provision for payment of overtime? 12:18:05
19	know. I haven't asked them. 12:16:01	19	A. I don't know. 12:18:08
20	Q. Is the French Vogue staff in 12:16:10	20	Q. Were all models photographed 12:18:08
21	Plaintiffs' 26? 12:16:12	21	individually like this? 12:18:20
22	A. Yes. 12:16:13	22	A. No. 12:18:21
23	Q. How would you classify this, 12:16:19	23	Q. Who selects which models to 12:18:22
24	the Vogue shoot? 12:16:27	24	photograph individually? 12:18:26
25	A. This is an editorial shoot. 12:16:28	25	A. There is, and, you know, I am 12:18:27
	Page 114		Page 116
1	Q. And what is the editorial 12:16:31	1	not 100 percent sure, but, you know, 12:18:30
2	shoot? 12:16:32	2	typically, there is a schedule and there 12:18:32
3	A. An editorial shoot is a shoot 12:16:32	3	is a set list. And that is a 12:18:33
4	that's for a magazine, a publication. A 12:16:35	4	collaborative process between Mr. Weber 12:18:40
5	magazine. 12:16:39	5	
)	and the client. 12:18:41
6			
6 7	Q. Did models get paid for this 12:16:42	6	Q. Was there a time that models 12:18:42
7	Q. Did models get paid for this 12:16:42 shoot? 12:16:44	6 7	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53
7 8	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45	6 7 8	 Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57
7 8 9	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49	6 7 8 9	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58
7 8 9 10	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51	6 7 8 9 10	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00
7 8 9 10 11	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53	6 7 8 9 10 11	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02
7 8 9 10 11 12	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56	6 7 8 9 10 11 12	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07
7 8 9 10 11 12 13	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56	6 7 8 9 10 11 12 13	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09
7 8 9 10 11 12 13 14	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58	6 7 8 9 10 11 12 13 14	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10
7 8 9 10 11 12 13 14 15	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00	6 7 8 9 10 11 12 13 14 15	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13
7 8 9 10 11 12 13 14 15 16	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01	6 7 8 9 10 11 12 13 14 15 16	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15
7 8 9 10 11 12 13 14 15 16 17	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01	6 7 8 9 10 11 12 13 14 15 16 17	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17
7 8 9 10 11 12 13 14 15 16 17	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02	6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19
7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09	6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production 12:19:20
7 8 9 10 11 12 13 14 15 16 17	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02	6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19
7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09	6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production 12:19:20
7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09 Who paid for Mr. Ardolf's 12:17:17	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production 12:19:20 people and the creative people will get 12:19:23
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09 Who paid for Mr. Ardolf's 12:17:17 travel to Golden Beach or Miami, if 12:17:21	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production 12:19:20 people and the creative people will get 12:19:23 together and figure out how to best make 12:19:24
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09 Who paid for Mr. Ardolf's 12:17:17 travel to Golden Beach or Miami, if 12:17:21 anyone? 12:17:25	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time possible. So, you know, the production people and the creative people will get 12:19:23 together and figure out how to best make 12:19:24 sure that what's required on, you know, 12:19:27
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Did models get paid for this shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are compensated, not always, but typically models are compensated directly by the 12:16:51 12:16:56 Q. And were they compensated 12:16:56 directly by the client in this case? 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09 Who paid for Mr. Ardolf's 12:17:21 anyone? 12:17:25 A. You know, there is a 12:17:26	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production people and the creative people will get 12:19:23 together and figure out how to best make 12:19:24 sure that what's required on, you know, 12:19:27 on the set list is accomplished in that 12:19:31
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Did models get paid for this 12:16:42 shoot? 12:16:44 A. For this shoot in particular, 12:16:45 I'm not sure. Typically models are 12:16:49 compensated, not always, but typically 12:16:51 models are compensated directly by the 12:16:53 client. 12:16:56 Q. And were they compensated 12:16:58 A. You know, I didn't check. I 12:17:00 don't know. 12:17:01 Q. And the client is? 12:17:01 A. Vogue Hommes or Conde Nast. 12:17:02 Q. Right. 12:17:09 Who paid for Mr. Ardolf's 12:17:17 travel to Golden Beach or Miami, if 12:17:25 A. You know, there is a 12:17:26 distinction between who actually 12:17:27	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Was there a time that models 12:18:42 had to be on set? 12:18:53 A. Yes. 12:18:57 Q. And who determines that time? 12:18:58 A. Again, I mean, that's, you 12:19:00 know, that's a function of what that's 12:19:02 a collaborative effort, you know, between 12:19:07 creative people, and at that point, 12:19:09 production people. You know, they are 12:19:10 presented with a window of time, you 12:19:13 know, we're going to shoot obviously 12:19:15 we're always trying to shoot in the 12:19:17 smallest, you know, window of time 12:19:19 possible. So, you know, the production 12:19:20 people and the creative people will get 12:19:23 together and figure out how to best make 12:19:24 sure that what's required on, you know, 12:19:27 on the set list is accomplished in that 12:19:31 period of time. 12:19:33

1	A. Yes. 13:25:50	1	where it says Bruce and Little Bear will 13:28:39
2	Q. How? 13:25:51		continue to be responsible for the 13:28:41
3	A. Probably by e-mail. 13:25:51	3	production of their photo shoots for 13:28:42
4	Q. How often? 13:25:53	4	Abercrombie? I am paraphrasing? 13:28:45
5	A. Only once and then included in 13:25:56	5	A. Yes, I do. 13:28:47
6	the new hire package. 13:25:59	6	Q. What I am not paraphrasing is 13:28:48
7	Q. Was it distributed to Little 13:26:02	7	the word "production." What does that 13:28:51
8	Bear independent contractors? 13:26:03	8	mean? 13:28:53
9	A. No. 13:26:04	9	A. So the production is the photo 13:28:53
10	O. Was it distributed to models 13:26:04	10	shoot and everything that goes into the 13:29:02
11	appearing at Little Bear? 13:26:08	11	photo shoot. You know, the logistics of 13:29:09
12	A. It was not. 13:26:09	12	bringing the people there. I would call 13:29:11
13			
	,	13	
14		14	,
15	Specifically, the Abercrombie photo shoot 13:26:23		Little Bear in this instance, you know, 13:29:19
16	in Florida in 2009. And was this photo 13:26:26	16	almost to be like an event planner, like 13:29:21
17	shoot for more than one brand? 13:26:42	17	a wedding planner. 13:29:22
18	A. For more than one Abercrombie 13:26:43	18	Q. So you earlier said production 13:29:32
19	brand. 13:26:51	19	is everything that goes into the making 13:29:36
20	Q. What were the brands? 13:26:52	20	of the photo shoot. Could you please 13:29:39
21	A. It was for Abercrombie and 13:26:53	21	enumerate the specific, what goes into 13:29:44
22	Ruehl. 13:26:55		it? 13:29:46
23	Q. And what's Ruehl? 13:26:56	23	A. Everything that goes into a 13:29:46
24	A. I don't know specifically which 13:26:57	24	photo shoot. All right, so, you know, 13:29:48
25	sub-brand it is. But it's a sub-brand of 13:27:00 Page 130	25	well, there is a lot. There is well, 13:29:50 Page 132
1	· · · · · · · · · · · · · · · · · · ·	1	-
1	Abercrombie. 13:27:02	1	<i>5</i> , 5
2	Q. Okay. And would you call this 13:27:03	2	collaboratively between the creative 13:30:01
3	photo shoot a brand shoot? What would 13:27:05	3	people and the client. They have to 13:30:03
4	you call it? 13:27:11	4	select who the talent is going to be. 13:30:04
5	A. We probably would just call it 13:27:11	5	There is location selection. 13:30:07
6	an Abercrombie shoot. But it's a brand 13:27:13	6	You know, again, this is a creative and 13:30:11
7	campaign. 13:27:15	7	collaborative process where the client 13:30:12
8	Q. A brand campaign, okay. I am 13:27:15	8	will ultimately and the client may, 13:30:16
9	going to show you a document marked as 13:27:37	9	you know, have something in mind to 13:30:18
10	Plaintiffs' 30. 13:27:40	10	begin. But location has to be sourced 13:30:20
11	(Plaintiffs' Exhibit 30,	11	and selected. 13:30:23
12	Document Bates stamped LBBW 36677, was	12	Often locations will be scouted 13:30:24
13	so marked for identification, as of	13	in advance, you know, the client may have 13:30:26
14	this date.) 13:27:56	14	a general geographic idea of where they 13:30:30
15	Q. Do you recognize this document? 13:27:56	15	would want the shoot to take place. But 13:30:31
16	A. I do. 13:27:58	16	then we would, you know, give the client 13:30:33
17	Q. What is it? 13:28:06	17	some options by scouting. So going into 13:30:37
18	A. This a Little Bear's agreement, 13:28:07	18	a photo shoot would be scouting and then 13:30:42
19	I believe it's an extension agreement. 13:28:09	19	ultimately procuring the different 13:30:43
20	It's Little Bear's agreement with 13:28:11	20	locations. 13:30:46
21	Abercrombie & Fitch. 13:28:13	21	It would be casting. And then 13:30:49
22	Q. Do the terms of this agreement 13:28:14	22	it would be every little aspect of 13:30:50
23	cover Mr. Baldwin's photo shoot? 13:28:15	23	logistics in order to make the photo 13:30:53
23	A. Yes. Yes, it would have. 13:28:17	24	shoot happen. So, you know in 13:30:56
24	71. 1 cs. 1 cs, it would have. 15.20.17		
	Q. Do you see on the first page 13:28:26	25	addition to casting, you know, there are 13:30:59

1	1	CERTIFICATION
2	2	
3	3	I, DAWN MATERA, a Notary Public for
4	4	and within the State of New York, do hereby
5	5	certify:
6	6	That the witness whose testimony as
7	7	herein set forth, was duly sworn by me; and
8	8	that the within transcript is a true record
9	9	of the testimony given by said witness.
10	10	I further certify that I am not
11	11	related to any of the parties to this action
12	12	by blood or marriage, and that I am in no way
13	13	interested in the outcome of this matter.
14	14	IN WITNESS WHEREOF, I have hereunto
15	15	set my hand this 3rd day of October, 2019.
16	16	
17	17	
18	18	Dawn Materia
19	19	Jan Marian
20	20	DAWN MATERA
21	21	
22	22	
23	23	
24	24	
25	25	
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